

Jonathan A. Rich, Esq.
Nevada Bar No.: 15312
COZEN O'CONNOR
500 North Rainbow Blvd., Suite 300
Las Vegas, NV 89107
Telephone: (702) 470-2324
Facsimile: (702) 470-2359
Email: JARich@cozen.com

*Attorney for Defendant
Perry Johnson & Associates, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PROSPERO RODRIGUEZ and MARIA
RODRIGUEZ, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

NORTHWELL HEALTH, INC. and PERRY
JOHNSON & ASSOCIATES, INC.,

Defendants.

CASE NO.: 2:23-cv-01874-CDS-DJA

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS PERRY JOHNSON &
ASSOCIATES, INC. AND NORTHWELL
HEALTH, INC. TO RESPOND TO
PLAINTIFFS' COMPLAINT**

(FIRST REQUEST)

Plaintiffs Prospero Rodriguez and Maria Rodriguez, individually and on behalf of all others similarly situated ("Plaintiffs"), and Defendants Perry Johnson & Associates, Inc. ("PJ&A") and Northwell Health, Inc. ("Northwell" and, collectively with PJ&A, "Defendants") stipulate and respectfully request under Local Rule IA 6 that this Court extend the time for Defendants to respond to Plaintiff's complaint in the above-captioned action (the "Complaint") until **March 1, 2024**.

Plaintiffs filed the Complaint on November 14, 2023. Northwell executed a waiver of service that was entered on November 28, 2023.

On December 8, 2023, a Motion for Transfer of Actions to United States District Court for the District of Nevada for Coordinated or Consolidated Pretrial Proceedings Pursuant to 28 U.S.C.

1 § 1407 (the “Motion”) was filed in the Judicial Panel on Multidistrict Litigation (“JPML”). *See In*
2 *re Perry Johnson & Associates Medical Transcription Data Security Breach Litigation*, Case MDL
3 No. 3096, ECF No. 1 (December 8, 2023). The motion directly concerns the potential consolidation
4 and transfer of at least forty-five related putative class action complaints. The JPML heard oral
5 arguments on the Motion on January 25, 2024.

6 Defendants’ individual responses are currently due by January 29, 2024.

7 This extension is necessary to allow the JPML sufficient time to evaluate the various related
8 actions, twenty-one of which have been filed in this District alone. A list of these related actions is
9 included as Appendix A. As nearly every party has agreed that centralization is proper, the primary
10 question for the JPML is *where* to centralize the cases, not *whether* to centralize them.

11 Plaintiff and the Defendants consent to this request. This is the first request for extension of
12 time for this deadline. The parties respectfully submit that there is good cause for this extension and
13 the requested extension is not for the purpose of delay.

14 ///

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16 IT IS SO STIPULATED.

1 Dated: January 26, 2024.

2 SNELL & WILMER LLP

3 By: /s/ Alex L. Fugazzi

4 Alex L. Fugazzi (NV Bar #9022)
Aleem A. Dhalla (NV Bar #14188)
3883 Howard Hughes Parkway, Ste 1100
5 Las Vegas, NV 89169-5958
Telephone: (702) 784-5200
6 afugazzi@swlaw.com
Adhalla@swlaw.com

7 William L. Roberts*
8 Kathryn E. Caldwell*
Andrew B. Cashmore*
9 ROPES & GRAY LLP
Prudential Tower
10 800 Boylston Street
Boston, Massachusetts 02199-3600
11 Phone: (617) 951-7000
Fax: (617) 951-7050
12 william.roberts@ropesgray.com
kathryn.caldwell@ropesgray.com
13 andrew.cashmore@ropesgray.com

14 Glen J. Dalakian II*
ROPES & GRAY LLP
15 1211 Avenue of the Americas
New York, New York 10036-8704
16 Phone: (212) 596-9000
Fax: (212) 596-9090
17 glen.dalakian@ropesgray.com

18 *Counsel for Defendant Northwell*
Health, Inc.
19 **pro hac vice forthcoming*

Dated: January 26, 2024.

STRANCH, JENNINGS & GARVEY,
PLLC

By: Nathan R. Ring

Nathan R. Ring (NV Bar #12078)
3100 W. Charleston Blvd, Suite 208
Las Vegas, NV 89102
Phone: (725) 235-9750
nring@stranchlaw.com

Amanda Brooke Murphy (*pro hac vice*)
MURPHY LAW FIRM
4116 Will Rogers Pkwy, Suite 700
Oklahoma City, OK 73108
Phone: (405) 389-4989
abm@murphylegalfirm.com

Counsel for Plaintiff and Putative Class

Dated: January 26, 2024.

COZEN O'CONNOR

By: /s/ Jonathan A. Rich

Jonathan A. Rich (NV Bar #15312)
500 North Rainbow Blvd., Suite 300
Las Vegas, NV 89107
Phone: (702) 470-2324
Fax: (702) 470-2359
jarich@cozen.com

Counsel for Defendant Perry Johnson &
Associates, Inc.

ORDER

Good cause appearing, IT IS HEREBY ORDERED that the Parties' stipulation is GRANTED. Defendants shall have up to and including **March 1, 2024** to respond to Plaintiff's complaint.

IT IS SO ORDERED.

DATED: January 29, 2024.

A handwritten signature in blue ink, appearing to read 'D. Albrechts', is written over a horizontal line.

DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

Appendix A

Related Cases Filed Against Perry Johnson & Associates, Inc. & Northwell Health, Inc. as of
January 24, 2024

1. *Abdaljalil v. Perry Johnson & Associates, Inc.*, No. 2:24-cv-00025 (D. Nev. filed Jan. 4, 2024)
2. *Belov et al v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-08583 (E.D.N.Y. filed Nov. 17, 2023)
3. *Belov et al v. Perry Johnson & Associates, Inc.*, No. 2:23-cv-01925 (D. Nev. filed Nov. 20, 2023)
4. *Bishop et al v. Bon Secours Mercy Health, Inc., and Perry Johnson & Associates, Inc.*, No. 3:23-cv-00385 (S.D. Ohio filed Dec. 22, 2023)
5. *Brewster v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-08627 (E.D.N.Y. filed Nov. 20, 2023)
6. *Brown v. Perry Johnson & Associates, Inc., and Northwell Health, Inc.*, No. 2:24-cv-10037 (E.D. Mich. filed Jan. 5, 2024)
7. *Carino et al. v. Northwell Health Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-02090 (D. Nev. filed Dec. 19, 2023)
8. *Carter v. Cook County Health and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01866 (D. Nev. filed Nov. 13, 2023)
9. *Colon et al v. Perry Johnson & Associates, Inc.*, No. 2:23-cv-01910 (D. Nev. Filed Nov. 20, 2023)
10. *Cook v. Northwell Health, Inc. and Perry Johnson & Associates, No. 23-000859* (N.Y. Sup. Ct., Nassau County filed Nov. 30, 2023)
11. *Davis v. Perry Johnson & Associates, Inc.*, No. 2:23-cv-01932 (D. Nev. Filed Nov. 21, 2023)
12. *Faivre v. Perry Johnson & Associates, Inc., Northwell Health, Inc., and Cook County Health, No. 2:23-cv-01926* (D. Nev. filed Nov. 20, 2023)
13. *Gerber v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-08467 (E.D.N.Y. filed Nov. 14, 2023)
14. *Gill v. Perry Johnson & Associates, Inc. and Northwell Health, Inc.*, No. 2:23-cv-01851 (D. Nev. filed Nov. 10, 2023)
15. *Green v. Perry Johnson & Associates, Inc.*, No. CVI-23-17247 (Toledo Municipal Court, Lucas County Ohio filed Dec. 12, 2023)
16. *Gregg v. Perry Johnson & Associates, Inc. and Northwell Health, Inc.*, No. 2:23-cv-01987 (D. Nev. filed Nov. 30, 2023)
17. *Heitzner v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 16119/2023 (N.Y. Sup. Ct., New York County filed Nov. 15, 2023)
18. *Hinda v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-09445 (E.D.N.Y. filed Dec. 21, 2023)

19. *Horsley et al v. Bon Secours Mercy Health, Inc., and Perry Johnson & Associates, Inc.*, No. 1:23-cv-00835 (S.D. Ohio filed Dec. 21, 2023)
20. *Hvidsten et al. v. Northwell Health, Inc.*, No. 2:23-cv-08538-RPK-ARL (E.D.N.Y. filed Nov. 16, 2023)
21. *H.Z. et al v. North Kansas City Hospital Auxiliary, Perry Johnson & Associates, Inc., Perry Johnson & Associates Coding Holding, Inc., and Perry Johnson & Associates Staffing Holding, Inc.*, No. 24CY-CV00708 (Cir. Ct. of Clay County, Missouri filed Jan. 17, 2024)
22. *Jackson v. Board of Trustees of North Kansas City Hospital, Meritas Health Corporation and Perry Johnson & Associates, Inc.*, No. 24CY-CV00519 (Cir. Ct. of Clay County, Missouri filed Jan. 12, 2024)
23. *Jon v. Perry Johnson & Associates, Inc., and Northwell Health, Inc.*, No. 2:24-cv-10100 (E.D. Mich. filed Jan. 12, 2024)
24. *Kaufman v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01935 (D. Nev. filed Nov. 21, 2023)
25. *Kay v. Perry Johnson & Associates, Inc. and Bon Secours Mercy Health, Inc., d/b/a Mercy Health*, No. 2:24-cv-00115 (D. Nev. filed Jan. 16, 2024)
26. *Kimber v. Cook County Health & Hospitals System and Perry Johnson & Associates, Inc.*, No. 2023-CH-09293 (Ill. Cir. Ct., Cook County filed Nov. 7, 2023)
27. *Kurtev et al v. Cook County Health & Hospitals System and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01905 (D. Nev. filed Nov. 17, 2023)
28. *Jerome v. Northwell Health*, No. 2:23-cv-8624 (E.D.N.Y. filed Nov. 20, 2023)
29. *Levitt v. Northwell Health Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01892 (D. Nev. filed Nov. 16, 2023)
30. *Lowery v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01857 (D. Nev. filed Nov. 13, 2023)
31. *Marconi et al. v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-08638 (E.D.N.Y. filed Nov. 21, 2023)
32. *Martin v. Cook County Health & Hospitals System and Perry Johnson & Associates, Inc.*, No. 2023-CH-09558 (Ill. Cir. Ct., Cook County filed Jan. 19)
33. *Mayo et al. v. Northwell Health Inc. and Perry Johnson & Associates*, No. 2:23-cv-08517 (E.D.N.Y. filed Nov. 16, 2023)
34. *O'Neill et al v. Perry Johnson & Associates, Inc., and County of Cook, Illinois*, No. 2:23-cv-01964 (D. Nev. filed Nov. 28, 2023)
35. *O'Rourke v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01880 (D. Nev. filed Nov. 14, 2023)
36. *Rodriguez et al. v. Northwell Health Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01874 (D. Nev. filed Nov. 14, 2023)

- 1 37. *Ruderman et al. v. Northwell Health Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-
2 02014 (D. Nev. filed Dec. 6, 2023)
- 3 38. *Sept et al v. Perry Johnson & Associates, Inc.*, No. 2:23-cv-01983 (D. Nev. Filed Nov. 30,
4 2023)
- 5 39. *Shanahan et al. v. Perry Johnson & Associates, Inc., Northwell Health, Inc., and Cook County*
6 *Health*, No. 2:23-cv-01947 (D. Nev. filed Nov. 22, 2023)
- 7 40. *Slotchiver v. Perry Johnson & Associates, Inc.*, No. 2:24-cv-00155 (D.S.C. Filed Jan. 10,
8 2024)
- 9 41. *Stone et al v. Salem Community Hospital and Perry Johnson & Associates, Inc.*, No. 4:23-cv-
10 02421 (N.D. Ohio filed Dec. 20, 2023)
- 11 42. *Sullivan v. Perry Johnson & Associates, Inc., and Northwell Health, Inc.*, No. 2:24-cv-10098
12 (E.D. Mich. filed Jan. 12, 2024)
- 13 43. *Tudda v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 618932/2023 (N.Y.
14 Sup. Ct., Nassau County filed Nov. 20, 2023)
- 15 44. *Vasquez v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-08544-
16 LDH-AYS (E.D.N.Y. filed Nov. 16, 2023)
- 17 45. *Vetere v. Northwell Health, Inc. and Perry Johnson & Associates, Inc.*, No. 2:23-cv-01900 (D.
18 Nev. filed Nov. 17, 2023)
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